

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

MASTER LOCK COMPANY LLC,

Plaintiff-Counterdefendant,

v.

Case 2:14-cv-00383-LA

INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA, and
INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA LOCAL 469,

Defendants-Counterclaimants,

and

JACQUELINE PETERSON, JACK SKOK,
and LAWRENCE JOZWIAK,

Defendants,

and

CLINTON CROSBY, CLYDE EHLERS,
and DORIS MEISSNER,

Counterclaimants.

**JOINT MOTION FOR APPROVAL OF
CLASS ACTION SETTLEMENT AGREEMENT**

The parties to this case have agreed on terms and conditions under which they believe this class action should be settled. Those terms and conditions are expressed in the attached Amended and Restated Settlement Agreement, Release, and Covenant Not To Sue. As explained in the concurrently filed memorandum in support, the agreement and the settlement it would

effect are fair, reasonable, and adequate. *See* Fed. R. Civ. P. 23(e). Accordingly, the parties urge the Court to approve the agreement and settlement on a preliminary basis; approve the parties' proposed notices to the classes and order that such notices be issued; schedule a fairness hearing; and, upon completion of the hearing, approve the agreement and settlement.

Dated: March 13, 2015

s/ Richard Saks

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Respectfully submitted,

s/ Joshua David Rogaczewski

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Attorneys for Master Lock Company LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2015, I electronically filed the foregoing **Joint Motion for Approval of Class Action Settlement Agreement** using the ECF system, which will send notification of such filing by operation of the Court's electronic filing system to all counsel of record except

Niraj R. Ganatra
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to whom a copy of the filing was sent by first-class mail.

s/ Joshua David Rogaczewski
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